

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ALBERT ROSSINI

Case No. 17 CR 522

1. At times material to this Indictment: Wintrust Bank, Green Dot Corporation, d/b/a Go Bank, JPMorgan Chase Bank N.A., Citibank, N.A., and U.S. Bank, N.A. (the “Banks”) were financial institutions whose deposits were insured by the Federal Deposit Insurance Corporation.

2. Beginning no later than in or about November 2016, and continuing through July 2017, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALBERT ROSSINI,

defendant herein, knowingly participated in a scheme to defraud financial institutions and to obtain money and property owned by, and under the custody and control of such financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that ALBERT ROSSINI knowingly and fraudulently caused to be created, or obtained under false pretenses, checks drawn on accounts held at the Banks in ROSSINI’s name or in the names of third parties (“the fraudulent checks”).

4. It was further part of the scheme that ALBERT ROSSINI provided the fraudulent checks to various individuals for the purpose of preventing or delaying those individuals from taking adverse action on debts ROSSINI owed them.

5. It was further part of the scheme that at times ALBERT ROSSINI knowingly and fraudulently deposited or caused to be deposited the fraudulent checks at the Banks, thereby temporarily inflating account balances so that ROSSINI could obtain cash withdrawn from the accounts.

6. It was further part of the scheme that on some occasions ALBERT ROSSINI successfully withdrew and caused to be withdrawn funds from the fraudulently inflated accounts before the Banks discovered that the fraudulent checks were invalid.

7. It was further part of the scheme that ALBERT ROSSINI opened or caused to be opened accounts in his own name at one or more of the Banks and then deposited into and issued from those accounts invalid checks for the purpose of fraudulently obtaining money based upon those invalid checks.

8. It was further part of the scheme that ALBERT ROSSINI converted the proceeds of the scheme to his own use and benefit.

9. It was further part of the scheme that ALBERT ROSSINI's actions exposed the Banks to a risk of loss, and caused actual losses to certain of the Banks.

10. It was further part of the scheme that ALBERT ROSSINI misrepresented, concealed, and hid and caused to be misrepresented, concealed, and hidden, the purposes of and the acts done in furtherance of the scheme.

11. On or about the dates set forth below, in the Northern District of Illinois, Eastern Division, and elsewhere,

ALBERT ROSSINI,

defendant herein, knowingly executed and attempted to execute the above-described scheme by depositing and causing to be deposited into a financial institution account the checks described below, with each deposit constituting a separate Count:

| Count | Date | Check Amount | Payor | Payee |
|-------|---------------|--------------|----------------------------------|----------------|
| 1 | May 23, 2017 | \$5,300 | Albert Rossini | Individual MB |
| 2 | May 24, 2017 | \$6,664 | A.F.T. JPS Imports International | Individual GS |
| 3 | May 24, 2017 | \$7,800 | Albert Rossini | Individual GS |
| 4 | July 25, 2017 | \$25,000 | A.F.T. JPS Imports International | Albert Rossini |

; and

ALBERT ROSSINI,

defendant herein, committed the offenses set forth in Counts One through Four while on release pending trial in another federal case, pursuant to an order of the United States District Court for the Northern District of Illinois.